

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	Criminal No. 1:15-CR-00223
	:	Criminal No. 1:21-CR-00100
	:	
v.	:	(Judge Conner)
	:	
JOAN CICCHIELLO	:	Electronically filed

**SUPPLEMENT TO BRIEF IN SUPPORT OF MOTION
FOR COMPASSIONATE RELEASE AND
REDUCTION OF SENTENCE UNDER 18 U.S.C. § 3582(c)(1)(A)**

And now, comes Joan Cicchiello, through counsel, Frederick W. Ulrich, Esquire, and Tammy L. Taylor, Esquire, of the Federal Public Defender's Office, and submits the following supplemental information in support of her request for compassionate release and reduction of sentence under 18 U.S.C. § 3582(c)(1)(A).

1. In October 2022, Joan Cicchiello filed a *pro se* request for compassionate release and reduction of sentence under 18 U.S.C. § 3582(c)(1)(A). (No. 1:21-CR-00100, Doc. 113).
2. The Federal Public Defender's Office was appointed to represent Ms. Cicchiello and filed a counseled brief in support in November 2022. (No. 1:21-CR-00100, Doc. 119).
3. The government filed its brief in opposition in December 2022, and undersigned counsel filed a reply brief in January 2023. (No. 1:21-CR-00100, Docs. 127, 131).

4. At the time of the briefing, Ms. Cicchiello's projected release date was July 11, 2024. *See* (Doc. 119 at 7).

5. On January 11, 2023, Ms. Cicchiello filed a supplement to advise this Court that the Bureau of Prisons recently changed her projected release date to September 5, 2023. (No. 1:21-CR-00100, Docs. 132).

6. The Bureau of Prisons has changed her projected release date again to August 11, 2023.

7. At this point, granting compassionate release will result in a reduction in her sentence of less than 7 months.

This Court should consider Ms. Cicchiello's updated release date when ruling on her motion under 18 U.S.C. § 3582(c)(1)(A).

Date: January 19, 2023

Respectfully submitted,

/s/ Frederick W. Ulrich

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CERTIFICATE OF SERVICE

I, Frederick W. Ulrich, Esquire, of the Federal Public Defender's Office, certify that I caused to be served on this date a copy of the foregoing filing via electronic case filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

Christian T. Haugsby, Esquire
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Date: January 19, 2023

/s/ Frederick W. Ulrich
FREDERICK W. ULRICH, ESQUIRE
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